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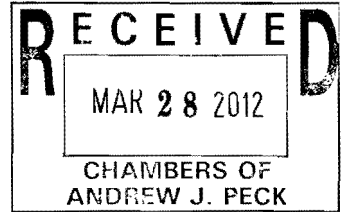
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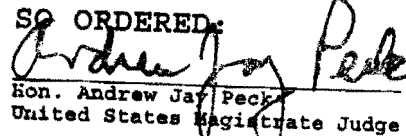
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March 27, 2011

*Adjournment granted. Conference
rescheduled for April 25, 2012
at 2:00 pm. 3/28/2012*

VIA FACSIMILE

Honorable Andrew J. Peck
U.S.D.C. – Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007
Fax No. 212-805-7933

SO ORDERED:

Hon. Andrew J. Peck
United States Magistrate Judge

Re: da Silva Moore, et al v. Publicis Groupe SA, et al. (11-cv-1279) (ALC) (AJP)

Dear Judge Peck,

Plaintiffs write in response to your clerk's phone request to provide the Court with (1) the reason for Plaintiffs' inability to attend the April 16 conference and (2) the progress of ESI discovery in this case.

All partners representing Plaintiffs and responsible for this case will be outside of New York and unable to attend the conference on April 16. Two partners will be in Washington, D.C. for another matter, and the third is unable to leave San Francisco due to childcare obligations the week of April 16-20. The earliest dates following April 16 on which all parties are available to appear in person are April 25, 26, and 27.

On March 21, MSL produced to Plaintiffs the Initial Random Sample of 2399 documents. Plaintiffs are reviewing these documents and plan to respond to MSL concerning the documents within the next few days. Plaintiffs are awaiting the production of documents that comprise the seed set of documents. The parties are in the process of conferring regarding a schedule for exchange of all ESI documents. We thank the Court for its time and consideration.

Respectfully submitted,


Deepika Bains

Cc: All counsel of record (via email)